IN THE UNITED STATES OF AMERICA EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

FILED US DISTRICT COURT EASTERN DISTRICT OF TEXAS
SAR SI MALAND, CLERK
DEPUTY

UNITED STATES OF AMERICA	§ §	BY DEPUTY
v.	§	No. 4:14CR28
	§	Judge Schell
DAVID BROWN (1)	§	C
MORRO ANDERSON (2)	§	
MEGAN EVANS (3)	§	
LANCE MOORE (4)	§	
AVERY GREENE (5)	§	
COY BARKER (6)	§	
TAMARA LINDQUIST (7)	§	
AARON PENNINGTON (8)	§ .	
WADE STARR (9)	§	
JONATHAN WADDLE (10)	§	
PEGGY WHITE (11)	§	
LINDA WILSON (12)	§	
MARK HODGES (13)	§	
GEORGE PARR (14)	§	
JEREMY BROWN (15)	§	
JERRY BOSTIC (16)	§	
ALEJANDRO LOPEZ (17)	§	
JUAN LOPEZ (18)	§	
RICK MCCARDY (19)	§	
MICHAEL MOUNT (20)	§	
RENE TAMEZ (21)	§	
KARLY WARREN (22)	§	
BART RAINES (23)	§	

SECOND SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 21 U.S.C. § 846 (Conspiracy to Possess with the Intent to Manufacture and Distribute Methamphetamine)

That from sometime in or about June 2012, and continuously thereafter up to and including May 14, 2014, in the Eastern District of Texas and elsewhere,

David Brown Morro Anderson Megan Evans Lance Moore Avery Greene Coy Barker Tamara Lindquist **Aaron Pennington** Wade Starr Jonathan Waddle **Peggy White** Linda Wilson **Mark Hodges** George Parr Jeremy Brown Jerry Bostic Alejandro Lopez Juan Lopez Rick McCardy Michael Mount Rene Tamez Karly Warren **Bart Raines**

defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine or 50 grams of methamphetamine (actual), a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

As a result of committing the offense charged in this Second Superseding Indictment, the defendants shall forfeit to the United States, pursuant to 21 U.S.C. § 846, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived from proceeds obtained directly or indirectly from the offenses.

All such proceeds and/or instrumentalities are subject to forfeiture by the government.

A TRUE BILL

75w

GRAND JURY FOREPERSON

JOHN M. BALES

LINGED STATES ATTORNEY

ERNEST GON

Assistant United States Attorney

May 14, 2014

Date

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BART RAINES (23)	§	

Count One

Violation:

21 U.S.C. § 846

Penalty:

If 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine or if 50 grams or more of methamphetamine (actual) -- not less than 10 years and not more that life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least five years.

Special Assessment: \$100.00